

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOHN FULTON,)
)
Plaintiff,)
)
vs.) No. 20 C 03118
)
ROBERT BARTIK, et. al.,)
)
Defendants.)
-----)
ANTHONY MITCHELL,)
)
Plaintiff,)
)
vs.) No. 20 C 03119
)
ROBERT BARTIK, et. al.,)
)
Defendants.)

The video-recorded deposition of JOHN
FULTON, taken pursuant to the Federal Rules of
Civil Procedure, before Kathleen A. Hillgard,
Certified Shorthand Reporter No. 084-004093,
at 33 West Monroe Street, Suite 1830, Chicago,
Illinois, on Monday, September 19, 2022, commencing
at 10:18 a.m. pursuant to notice.

1 A. Yes. They were present.

2 Q. Were Zalatoris and Breen at some point
3 out of the presence of you and Bartik?

4 A. Not both of them.

5 Q. Okay. You're saying all -- anytime you
6 were with Bartik, you were also with either
7 Zalatoris and Breen?

8 A. Yes.

9 Q. You think that or you're sure about
10 that?

11 A. We weren't left in the room by
12 ourselves.

13 Q. So Bartik introduced himself and said,
14 This a voluntary process. And then what happened?

15 A. He under -- he asked me did I
16 understand what I was doing there. He told me that
17 I had to sign a form before the test could be
18 administered. He placed the form in front of my
19 face.

20 At that point, him, Zalatoris, and
21 Breen stepped out the room. I signed the form.
22 And a little while later, maybe like five or ten
23 minutes later, could have been longer, not too
24 long, they entered back into the room, and

1 Zalatoris or Breen said, It's not going to hold up
2 in court; let's go.

3 Q. After Zalatoris or Breen said, It's not
4 going to hold up in court, let's go, did you say
5 anything?

6 A. No.

7 Q. You just went along and left?

8 A. Yeah.

9 Q. Did Bartik say anything at that point?

10 A. Not that I can recall, no.

11 Q. Other than Bartik introducing himself
12 and saying that this is a voluntary process and
13 giving you the form to sign, do you remember him
14 saying anything else?

15 A. No.

16 Q. Did he ever yell at you?

17 A. No.

18 Q. Did he every threaten you?

19 A. No.

20 Q. Ever promise you anything?

21 A. No.

22 Q. About how long total would you say you
23 were with Bartik?

24 A. Maybe 10, 15 minutes.